

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

John K. Goodrow,	:	
Plaintiff,	:	
v.	:	Civil Action No: 3:11-cv-00020-MHL
	:	(Consolidated)
Friedman & MacFadyen, P.A., et al.	:	
Defendants.	:	

**DEFENDANTS' MOTION FOR ENLARGEMENT OF
PERMISSIBLE NUMBER OF PAGES FOR THEIR MOTION TO DISMISS**

COME NOW the Defendants, by counsel, and move for an enlargement of the permissible number of pages for the Motions to Dismiss they anticipate filing on February 22, 2013. In support of this Motion, Defendants state as follows:

1. Plaintiffs have filed individual Amended Complaints in each of the *Banks*, *Buel*, *Chatter*, *Goodrow*, *Mbundure*, and *McBeth* matters. Each Complaint is between 64 and 83 pages long—and nearly 200 pages with exhibits.

2. The Amended Complaints include claims for breach of fiduciary duty, violations of Racketeer Influenced and Corrupt Organizations Act, and violations of the Fair Debt Collection Practices Act. Plaintiffs seek to proceed with all claims as class actions.

3. Plaintiffs Banks, Buel, Chatter, Goodrow, Mbundure, and McBeth required far more than 30 pages in which to make their factual assertions, without having to make any legal argument in support of their claims.

4. In order to properly explain their arguments, Defendants respectfully request an enlargement of the 30 page limit prescribed by Local Rule 7(F)(3). In the interest of judicial

economy, Defendants request that they be permitted to file one consolidated 60 page brief in response to all six Amended Complaints.

5. No prejudice accrues to any party should the Court grant this request and Defendants would be prejudiced by the inability to fully present their arguments if the request were denied.

6. The Plaintiffs object to this request.

For the foregoing reasons, Defendants respectfully request that they be permitted to file a consolidated brief in support of their Motions to Dismiss in the Banks, Buel, Chatter, Goodrow, Mbundure, and McBeth matters of up to 60 pages, exclusive of affidavits and supporting documentation.

DATED: February 15, 2013

Respectfully Submitted,

**FRIEDMAN & MACFADYEN, P.A.,
F&M SERVICES, L.C.,
JOHNIE MUNCY**

By Counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

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